April 18, 2013

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: WT Docket No. 11-49

Dear Chairman Genachowski,

The Metropolitan Emergency Services Board ("MESB") provides oversight and management of the regional 9-1-1 system in the Minneapolis and St. Paul nine county metropolitan area. The Minnesota Department of Public Safety, Emergency Communication Networks Division ("ECN") oversees the Statewide 911 Program. We write on behalf of the MESB and ECN to affirm Minnesota's strong interest in improved E911 location capabilities. Together, MESB and ECN coordinate 911 systems and public safety answering points that handle more than two million emergency calls annually. The 911 system is a critical foundation to our emergency response system, and accurate location information is a key component of the effective operation of the 911 system. MESB and ECN therefore urge the Commission to ensure that emerging technologies with the potential to improve E911 location accuracy are made available to the public and to first responders as soon as possible.

As the Commission is aware, cell phones have decisively replaced traditional landlines as the phone of choice in emergencies. This transition has created significant challenges for emergency responders attempting to locate callers, particularly those in dense urban areas and multistory buildings. The 100/300 meter accuracy provided by current E911 location technologies is often dramatically insufficient, providing search rings which can contain multiple city blocks and include thousands of apartments in multistory buildings. As the Commission's Communications Security, Reliability and Interoperability Council ("CSRIC") Working Group 3 has explained, effective emergency response ultimately requires "reliable and consistent caller

location information to a specific dispatch-able building (and floor in multi-story environments)." While we do not endorse any particular technology, we do concur in the CSRIC's observation that new emerging technologies can significantly improve on the present limited accuracy and have the potential to provide tangible public safety benefits.

The MESB and ECN are aware that one company has constructed a position location network using licenses in the 902-928 MHz multilateration location and monitoring service ("M-LMS") band, and has requested approval from the Commission to begin commercial operations. This network was among the technologies included in the December 2012 indoor location accuracy testing carried out by CSRIC Working Group 3 in San Francisco, CA. According to the March 14, 2013 Indoor Location Test Bed Report from this testing, the results demonstrated that these technologies can provide "improved search rings in the horizontal dimension (often identifying the target building, or those immediately adjacent)" as well as "substantial progress in the vertical dimension [of] approximate[ly] floor level accuracy." The MESB, represented by Martin Moody, was an active participant in CSRIC Working Group 3, and concurs fully with the conclusions and recommendations contained in the Public Safety Foreword to the final Test Bed Report.

Because such capabilities could provide a substantial improvement over current accuracy limitations in dense urban areas and multistory buildings, we concur with CSRIC that "the standardization, commercial availability and deployment of such technologies are priorities for all stakeholders." MESB and ECN therefore urge the Commission to take the steps necessary to ensure that these promising technologies can be made available to public safety and the public as soon as possible.

Sincerely,

Martin Moody
Executive Director
Metropolitan Emergency Services Board

Jackie Mines, Director
Emergency Communication Networks

Department of Public Safety
State of Minnesota.